

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 1:24-CR-33
)	
v.)	GOVERNMENT’S SENTENCING
)	MEMORANDUM CONCERNING
NICHOLAS TYLER BANKS)	RESTITUTION
_____)	

NOW COMES the United States of America, by and through Russ Ferguson, United States Attorney for the Western District of North Carolina, with an agreement between the parties concerning restitution.

1. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Margaret Mabie who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].” Defendant possessed child pornography images and videos of this victim. The parties have agreed that Defendant will pay \$3,500.00 in restitution towards this victim.

Attorney Mabie informs the undersigned that payments should be made to:

Marsh Law Firm PLLC
ATTN: [REDACTED]
PO Box 4668 #65135
New York, New York 10163-4668

Attorney Mabie requests that payments be made payable to “Marsh Law Firm PLLC in trust for [REDACTED]” and should include Defendant’s name in the memo line of any check and include “ATTN: [REDACTED]” in the address. Defense counsel has agreed to this request.

2. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Carol Hepburn who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].”

Defendant possessed child pornography images and videos of this victim. The parties have agreed that Defendant will pay \$3,000.00 in restitution towards this victim.

Attorney Hepburn informs the undersigned that payments should be made to:

**Carol L. Hepburn I/T/F “[REDACTED]”
P.O. Box 17718
Seattle, Washington 98127**

Attorney Hepburn requests that payments be made payable to “Carol L. Hepburn I/T/F [REDACTED].” Defense counsel has agreed to this request. Additionally, Attorney Hepburn requests that restitution checks only be sent once the amount collected has reached a minimum \$50.00.

3. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Carol Hepburn who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].” Defendant possessed child pornography images videos of this victim. The parties have agreed that Defendant will pay \$3,500.00 in restitution towards this victim.

Attorney Hepburn informs the undersigned that payments should be made to:

**Carol L. Hepburn I/T/F “[REDACTED]”
P.O. Box 17718
Seattle, Washington 98127**

Attorney Hepburn requests that payments be made payable to “Carol L. Hepburn I/T/F [REDACTED].” Defense counsel has agreed to this request. Additionally, Attorney Hepburn requests that restitution checks only be sent once the amount collected has reached a minimum \$50.00.

4. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Carol Hepburn who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].”

Defendant possessed child pornography images and videos of this victim. The parties have agreed that Defendant will pay \$4,000.00 in restitution towards this victim.

Attorney Hepburn informs the undersigned that payments should be made to:

**Carol L. Hepburn I/T/F “[REDACTED]”
P.O. Box 17718
Seattle, Washington 98127**

Attorney Hepburn requests that payments be made payable to “Carol L. Hepburn I/T/F [REDACTED].” Defense counsel has agreed to this request. Additionally, Attorney Hepburn requests that restitution checks only be sent once the amount collected has reached a minimum \$50.00.

5. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Tanya Hankins who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].” Defendant possessed child pornography images and videos of this victim. The parties have agreed that Defendant will pay \$3,000.00 in restitution towards this victim.

Attorney Hankins informs the undersigned that payments should be made to:

**Restore the Child PLLC
2522 N. Proctor Street
Suite 85
Tacoma, Washington 98406**

Attorney Hankins requests that payments be made payable to “Restore the Child in Trust for [REDACTED].” Defense counsel has agreed to this request.

6. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Amy Zigarovich who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].” Defendant possessed child pornography videos of this victim. The parties have agreed that Defendant will pay \$3,000.00 in restitution towards this victim.

Attorney Zigarovich inform the undersigned that payments should be made to:

Jones Day
Attn: Amy J. Zigarovich
500 Grant Street, Suite 4500
Pittsburgh, Pennsylvania 15219-2514

Attorney Zigarovich requests that payments be made payable to “Jones Day in trust for [REDACTED].”

Defense counsel has agreed to this request.

7. Request from the “[REDACTED]” Series

The United States received a restitution request from attorney Jenna Solari who represents the victim using the pseudonym “[REDACTED],” from a series of child pornography called “[REDACTED].” Defendant possessed child pornography videos of this victim. The parties have agreed that Defendant will pay \$3,000.00 in restitution towards this victim.

Attorney Solari informs the undersigned that payments should be made to:

Baker & Hostetler, LLP, ITF “[REDACTED]”
1170 Peachtree St. NE, Suite 2400
Atlanta, Georgia 30309
ATTN: Accounting Supervisor

Attorney Solari requests that payments be made payable to “Baker & Hostetler, LLP, ITF [REDACTED].” Defense counsel has agreed to this request.

8. Conclusion

For these reasons, the United States respectfully requests that the Court enter the above restitution orders for each victim. The following table summarizes the amounts:

Series – Victim Pseudonym	Settlement Amount
[REDACTED]	\$3,500
[REDACTED]	\$3,000
[REDACTED]	\$3,500
[REDACTED]	\$4,000
[REDACTED]	\$3,000
[REDACTED]	\$3,000

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Total	\$23,000

RESPECTFULLY SUBMITTED, this the 3rd day of June 2025.

RUSS FERGUSON
UNITED STATES ATTORNEY

/s/ ALEXIS SOLHEIM
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